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May 7, 2021

Hon. Paul A. Engelmayer  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Dear Judge Engelmayer:

We represent Plaintiffs in the matter *D.J.C.V. et al. v. United States of America*, No. 20-cv-5747 (PAE). On April 30, 2021, Plaintiffs advised the Court that the parties were contemplating seeking a stay of proceedings in this case in order to discuss the possibility of settlement. With the Government's consent, Plaintiffs now formally move this court to hold all proceedings, including discovery, in abeyance so that the parties can more fully focus on settlement discussions. The parties contemplate being able to give the Court a status update on June 11, 2021.

We thank the Court for considering this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ghita Schwarz".

Ghita Schwarz  
Senior Staff Attorney